NICHOLAS A. CARLIN (SB 112532)
nac@phillaw.com
PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP
39 Mesa Street, Suite 201
The Presidio
San Francisco, CA 94129
Telephone: 415-398-0900
Facsimile: 415-398-0911

ROBERT K. SHELQUIST
rkshelquist@locklaw.com
REBECCA A. PETERSON (SB 241858)
rapeterson@locklaw.com
LOCKRIDGE GRINDAL NAUEN P.L.L.P
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: 612-339-6900
Fax: 612 339-0981
Co-Lead Interim Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SHANE MICHAEL, JONATHAN D. RUBIN, DREAMA HEMBREE, AND ETHEL LUNG each individually and on behalf of all those similarly situated, Plaintiffs, v. Honest Company Inc., Defendant.	Court File No. 2:15-cv-07059-JAK-AGR *[Consolidated with Rubin v. The Honest Company, Inc., Case No. 2:15-cv-09091-JAK-AGR]* **STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND STAY MOTION TO COMPEL ARBITRATION BRIEFING** **Judge: Hon. John A. Kronstadt**

CANDACE HIDDLESTONE and JULIE HEDGES, individually and on behalf of all those similarly situated, Plaintiffs, v. THE HONEST COMPANY INC., Defendant.	)	Court File No. 2:16-cv-07054 JAK (AGRx)

This Stipulation to continue the Case Management Conference ("CMC") and stay the motion to compel arbitration (Dkt. No. 31) briefing deadline is entered into between Plaintiffs, by and through their undersigned attorneys, and Defendant, The Honest Company, Inc. ("Honest"), by and through its undersigned attorneys, pursuant to the following: WHEREAS, the above-captioned cases together with cases filed in other jurisdictions reached a mediated settlement agreement in principle on a classwide basis on February 21, 2017 subject to settlement documentation being approved by all parties in all cases. WHEREAS, the parties presently anticipate that they should be able to complete a written settlement agreement and have the plaintiffs to the actions included in the settlement in principle move for preliminary settlement approval within 45 days.

WHEREAS, the Court has scheduled a Case Management Conference hearing date for February 27, 2017. Additionally, Defendant has pending a motion to compel arbitration in the *Hiddlestone* case and Plaintiffs' responsive memorandum is currently due February 27, 2017. WHEREAS, to preserve party and Court resources the parties desire that the CMC be continued to allow time for the settlement papers to be drafted and the details of coordinated motions for preliminary of the settlement to be finalized. Additionally, to preserve party and Court resources, the parties also desire that the Plaintiffs' deadline to the motion to compel arbitration should be stayed indefinitely. WHEREAS, the parties met and conferred and now AGREE AND STIPULATE THAT THEY REQUEST THE COURT FOR THE ENTRY OF THE FOLLOWING ORDER:

1. The February 27, 2017 Case Management Conference is continued until April 17, 2017.

2. Briefing on the pending motion to compel arbitration in the *Hiddlestone* case is continued indefinitely.

Respectfully submitted,

Dated: February 24 2017

LOCKRIDGE GRINDAL NAUEN P.L.L.P

By s/ Robert K. Shelquist

Rebecca A. Peterson (SB 241858)
rapeterson@locklaw.com
Robert K. Shelquist
rkshelquist@locklaw.com
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Tel: 612-339-6900
Fax: 612 339-0981

PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP
Nicholas A. Carlin
39 Mesa Street, Suite 201
The Presidio
San Francisco, CA 94129
Telephone: 415.398.0900
Facsimile: 415.398.0911
nac@phillaw.com

ATTORNEYS FOR PLAINTIFFS
CO-INTERIM LEAD CLASS COUNSEL

COOLEY LLP

By s/ William P. Donovan, Jr.

William P. Donovan, Jr. (155881)
Darcie A. Tilly (239715)
Matthew D. Caplan (260388)
Joseph B. Woodring (272940)
1333 2ND Street, Suite 400
Santa Monica, CA 90401

ATTORNEYS FOR DEFENDANT

ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I, Robert K. Shelquist, attest that concurrence in the filing of this document has been obtained from each of the other signatories.

February 24, 2017

By s/ Robert K. Shelquist